

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MASSACHUSETTS NURSES
ASSOCIATION,

Plaintiff,

v.

NATIONAL NURSES UNITED, AFL-CIO

Defendant

Civil Action No. 15-11804

CERTIFICATION IN ACCORDANCE WITH LOCAL RULE 16.1(d)(3)(a)-(b)

I, James F. Lamond, the undersigned counsel of record for the Plaintiff, Massachusetts Nurses Association, do certify that:

1. I am the duly authorized representative and attorney of the Plaintiff.
2. On October 14, 2015, I conferred with opposing counsel for the Defendant National Nurses United, AFL-CIO.
3. My client and I have considered the resolution of this litigation through the use of alternative dispute resolution programs such as those outlined in Local Rule 16.4.
4. I have conferred with my client with a view toward establishing a budget for the costs of conducting the full course and various alternative

courses of the litigation.

For the plaintiff, Massachusetts
Nurses Association,

By its attorneys,

/s/ James F. Lamond

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Southborough, MA 01772-1756
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Date: October 15, 2015

So certified:

MNA Representative:



Julie B. Pinkham
Julie B. Pinkham, Executive Director

CERTIFICATE OF SERVICE

I, James F. Lamond, hereby certify that I have this day by the Electronic Case File system) served a copy of the foregoing Certification In Accordance With Local Rule 16.1(d)(3)(a)-(b) upon Michael T. Anderson, manderson@murphypllc.com Murphy Anderson PLLC 111 Devonshire St. 5th Floor, Boston, Massachusetts 02109.

Dated: October 15, 2015

/s/ James F. Lamond
James F. Lamond